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September 9, 2002

SEP 14 2002

MaryAnn Manoogian, Director
Governor's Office of Energy and Community Services
Concord, NH 03301

Re: New Hampshire Energy Plan

Dear Ms. Manoogian,

In response to the invitation of the Governor's Office of Energy and Community Services (GOECS), New Hampshire Electric Cooperative (NHEC) appreciates the opportunity to provide written comments on the 10-Year New Hampshire Energy Plan.

NHEC took an active interest in this initiative from the time it was proposed and looked forward to an active role as a stakeholder on behalf of the 70,000 accounts of NHEC's consumer-owners. NHEC has participated in stakeholder and public sessions sponsored by GOECS in the course of the Plan's development. Those meetings have provided the opportunity for interested parties to provide input both at a high level and as to the technical intricacies of the modeling.

As I have expressed to you previously, we believe the opportunity for stakeholder collaboration and influence on the Plan was somewhat limited, but understandably so given a fairly short time frame, limited budget and the large number of interested parties. Despite that concern we believe you, your staff, the project consultants and participating stakeholders are all to be commended for this initial effort. We believe it will provide useful information for near-term policy consideration and debate, but more importantly can be the basis for a framework and technical capabilities that will be valuable to New Hampshire's ongoing strategic energy planning.

With respect to modeling specifics we are aware of comments and suggestions offered by the Unitil Companies. NHEC generally support those suggestions recognizing that they relate to various scenarios within the selected study areas. We do think that excluding the sector responsible for the largest portion of New Hampshire's energy usage and emissions, i.e., transportation, from detailed scenario analysis and policy consideration inherently limits the value of this edition of the Plan insofar as its acceptance as a truly comprehensive assessment and its potential returns as a strategy tool. We believe that

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continued primary focus on stationary-use sectors for scenario analysis may mislead policy makers to over-emphasize strategies affecting providers and consumers in those sectors (which are primarily utility consumers and their energy providers), while more fruitful opportunities that may be available from the transportation sector may will continue to go unexplored and untapped. We are hopeful and confident that future editions of the Plan will seek more balance in this regard.

Again, NHEC particularly appreciates the energy and commitment GOECS staff has invested in this initiative and the opportunity for NHEC to be part of this important dialogue on behalf of our members.

Sincerely,



Stephen E. Kaminski
VP, Power Resources, Access, and Pricing